

EXHIBIT 22

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DIAGNOSTIC RESEARCH
GROUP, LLC,

Plaintiff

v.

TOSHIBA AMERICA MEDICAL
SYSTEMS, INC.,

Defendant

x
x
x
x
x
x
x

ORIGINAL

U.S. District Court

Civil No. L-02-3020

Court Case No.

03-C-02-006016

Deposition of KENT B. STANSBURY

Baltimore, Maryland

Thursday, March 20, 2003

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CONDUCTED ON THURSDAY, MARCH 20, 2003

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1 Q And that had been referred to as a cold
2 head; is that correct? Is that what broke?

3 A Actually no. In that particular incident
4 the chiller was the item that malfunctioned, which in
5 turn, caused the magnet to quench or what we call
6 controlled ramp down.

7 Q Now, what is the chiller? I just want to
8 make sure I understand the technology a little bit.

9 A Sure. The chiller is essentially like an
10 air conditioner. It cools a component. In this
11 particular case it was a cold head of our magnet.

12 Q And what is a cold head just so we
13 understand?

14 A The cold head is the component which
15 actually brings the magnet down to superconducting
16 temperatures.

17 Q Which is approximately?

18 A Minus 450 degrees Fahrenheit, 4 degrees
19 Kelvin.

20 Q So the cold head again is the device that
21 brings it down. The cold head is run by the chiller
22 or the chiller just --

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1 the document if it will refresh your recollection.

2 A Sure.

3 Q Would it help you?

4 A Yeah. I don't remember off the top of my
5 head when the date was that that device was
6 installed.

7 Q I can just show you what's been marked, a
8 three-page, what's been marred as Exhibit 18 in
9 Jeffrey Low's deposition. It's a letter dated
10 December 23, '98.

11 (Document tendered to witness.)

12 A Okay.

13 Q Does that refresh your recollection as to
14 what was installed?

15 A Yes.

16 Q And can you describe what that was?

17 A It was a remote monitoring device that
18 monitored the chiller water temperature and also the
19 internal temperatures of the magnet itself.

20 Q Now, the chiller was something that was
21 covered under Toshiba's warranty; is that correct?

22 A Correct.

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1 MR. SPERLING: Well, then I'll ask a
2 slightly different one.

3 BY MR. SPERLING:

4 Q The warranty is in effect with obviously
5 Toshiba would be calling --

6 If you can fix the Arctic Chiller, you
7 would do it; is that correct?

8 A Correct.

9 Q And you would do that under the warranty;
10 is that correct?

11 A Correct.

12 Q And the warranty provided by Toshiba,
13 correct?

14 A Correct.

15 Q If you could not, you would call Arctic
16 Chiller; is that correct?

17 A Correct.

18 Q And Arctic Chiller would have to come out
19 and do what it does with regard to the chiller,
20 correct?

21 A Yes.

22 Q And Toshiba would do what's necessary to